

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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:
In re: : Chapter 11
:
CELADON GROUP, INC., *et al.*,¹ : Case No. 19-12606 (KBO)
:
Debtors. : (Jointly Administered)
-----X

**NOTICE OF HEARING AGENDA FOR MATTERS SCHEDULED FOR HEARING ON
JANUARY 30, 2020 AT 2:30 P.M. (ET) - 6TH FLOOR, COURTROOM #1^{2 3}**

MATTERS WITH CERTIFICATIONS OF COUNSEL [COC/CNO]:

1. Motion of the Debtors for Entry of an Order Approving the Key Employee Incentive Plan [D.I. 235; Filed 1/7/20].

Response Deadline: January 21, 2020 at 4:00 p.m. (ET). Extended to January 24, 2020 at 4:00 p.m. (ET) for the Office of the United States Trustee.

Related Documents:

- A. Motion of the Debtors for Entry of an Order Authorizing the Debtors to File Under Seal Key Employee Incentive Plan [D.I. 236; Filed 1/7/20].

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celadon Group, Inc. (1050); A R Management Services, Inc. (3604); Bee Line, Inc. (5403); Celadon Canadian Holdings, Limited (2539); Celadon E-Commerce, Inc. (2711); Celadon International Corporation (5246); Celadon Logistics Services, Inc. (0834); Celadon Mexicana, S.A. de C.V. (6NL7); Celadon Realty, LLC (2559); Celadon Trucking Services, Inc. (6138); Distribution, Inc. (0488); Eagle Logistics Services Inc. (7667); Hyndman Transport Limited (3249); Jaguar Logistics, S.A. de C.V. (66D1); Leasing Servicios, S.A. de C.V. (9MUA); Osborn Transportation, Inc. (7467); Quality Companies LLC (4073); Quality Equipment Leasing, LLC (2403); Quality Insurance LLC (7248); Servicios Corporativos Jaguar, S.C. (78CA); Servicios de Transportación Jaguar, S.A. de C.V. (5R68); Stinger Logistics, Inc. (3860); Strategic Leasing, Inc. (7534); Taylor Express, Inc. (9779); Transportation Insurance Services Risk Retention Group, Inc. (7197); Vorbas, LLC (8936). The corporate headquarters and the mailing address for the Debtors listed above is 9503 East 33rd Street, One Celadon Drive, Indianapolis, IN 46235.

² Copies of all petitions, motions and pleadings identified herein may be obtained through the website of the Debtors' claims agent at <http://www.kccllc.net/celadon>.

³ Any party participating telephonically must make arrangements through CourtCall by telephone (866-582-6878) or facsimile (866-533-2946).

- B. Sealed Exhibit B – KEIP [D.I. 237; Filed 1/7/20].
- C. Declaration of Brian C. Maloney of AlixPartners, LLP in Support of Motion of the Debtors for Entry of an Approving the Key Employee Incentive Plan [D.I. 362; Filed 1/28/20].
- D. Certification of Counsel Regarding Order Approving the Key Employee Incentive Plan and the Order Authorizing the Debtors to File Under Seal Key Employee Incentive Plan [D.I. TBD; Filed TBD].

Responses Received:

- A. U.S. Trustee's Limited Omnibus Objection to the Motion of the Debtors for Entry of an Order Approving the Key Employee Incentive Plan [D.I. 235] (the KEIP Motion), and the Motion of the Debtors for Entry of an Order Authorizing the Debtors to File Under Seal Key Employee Incentive Plan [D.I. 236] (the KEIP Sealing Motion) [D.I. 349; Filed 1/24/20].

Status: The Debtors intend to file an agreed order for this matter under certification of counsel, therefore, the Debtors anticipate that no hearing will be necessary unless the Court has any comments or questions.

- 2. Regions Commercial Equipment Finance, LLC's Motion for Relief from the Automatic Stay [D.I. 279; Filed 1/14/20].

Response Deadline: January 23, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Certification of Counsel Regarding Regions Commercial Equipment Finance, LLC's Motion for Relief from the Automatic Stay [D.I. 350; Filed 1/24/20].

Responses Received: None.

Status: An agreed order has been submitted for this matter under certification of counsel, therefore no hearing is necessary unless the Court has any comments or questions.

- 3. Motion of the Huntington National Bank for Relief from the Automatic Stay [D.I. 290; Filed 1/15/20].

Response Deadline: January 23, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Declaration of Brad Smith in Support of the Motion of the Huntington National Bank for Relief from the Automatic Stay [D.I. 292; Filed 1/15/20].

- B. Certification of Counsel Regarding Order Approving Motion of The Huntington National Bank for Relief from the Automatic Stay [D.I. 351; Filed 1/24/20].
- C. Order Granting Motion of the Huntington National Bank for Relief From the Automatic Stay [D.I. 354; Filed 1/27/20].

Responses Received: None.

Status: An order has been entered for this matter, therefore, no hearing is necessary.

MATTERS GOING FORWARD:

- 4. Motion of First Insurance Funding for Relief from the Automatic Stay as to Premium Finance Agreements [D.I. 240; Filed 1/8/20].

Response Deadline: January 22, 2020 at 4:00 p.m. (ET). Extended to January 28, 2020 at 4:00 p.m. (ET) for the Debtors.

Related Documents: None.

Responses Received: None.

Status: Upon the agreement of the parties, this matter will go forward as a preliminary hearing, with a final hearing going forward at the omnibus hearing on February 26, 2020 at 10:00 a.m. (ET).

- 5. Motion of the Debtors for the Entry of an Order Authorizing the Debtors to Retain, Employ and Compensate Professionals Utilized in the Ordinary Course of Business and Granting Related Relief [D.I. 242; Filed 1/8/20].

Response Deadline: January 22, 2020 at 4:00 p.m. (ET).

Related Documents: None.

Responses Received: None.

Status: The Debtors received no responses by the response deadline, and therefore intend to file a CNO.

- 6. Motion of the Debtors for Entry of an Order Authorizing and Approving the Stipulation By and Between the Debtors and Honda North America, Inc. Regarding Claims and Obligations Pursuant to the Agreement for Motor Carrier Transportation Services [D.I. 357; Filed 1/27/20].

Response Deadline: At the hearing on January 30, 2020 at 2:30 p.m. (ET).

Related Documents:

- A. Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the Motion of the Debtors for Entry of an Order Authorizing and Approving the Stipulation By and Between the Debtors and Honda North America, Inc. Regarding Claims and Obligations Pursuant to the Agreement for Motor Carrier Transportation Services [D.I. 358; Filed 1/27/20].
- B. Order Shortening Notice and Objection Periods in Connection with the Motion of the Debtors for Entry of an Order Authorizing and Approving the Stipulation By and Between the Debtors and Honda North America, Inc. Regarding Claims and Obligations Pursuant to the Agreement for Motor Carrier Transportation Services [D.I. 361; Filed 1/28/20].

Responses Received: None.

Status: This matter is going forward.

SALE RELATED MATTERS:

- 7. Taylor Express, Inc. – Motion of the Debtors for Orders: (I)(A) Approving Bidding Procedures and Bid Protections, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of the Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving the Sale of Substantially All Assets of Taylor Express, Inc. Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 48; Filed 12/10/19].

Response Deadline: January 23, 2020 at 4:00 p.m. (ET). Extended for Anthem and Infor (US), Inc. to January 27, 2020 at 4:00 p.m. (ET). Extended for Honda to January 28, 2020 at 10:00 a.m. Extended for MidCap to January 28, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Affidavit of Service: Bidding Procedures Motion [D.I. 89; Filed 12/16/19].
- B. Notice of Motion and Hearing [D.I. 115; Filed 12/19/19].
- C. Notice Of Filing Of Exhibits To Debtors' Taylor Express Assets Bidding Procedures Motion [D.I. 178; Filed 12/30/19].
- D. Affidavit of Service: Notice of Filing of Exhibits to Debtors' Taylor Express Assets Bidding Procedures Motion [D.I. 185; filed 12/31/19].
- E. Notice of Filing of Asset Purchase Agreement as Exhibit to Debtors' Taylor Express Assets Bidding Procedures Motion [D.I. 197; Filed 1/3/20].
- F. Certification of Counsel in Connection with Order Approving Taylor Express Assets Bidding Procedures [D.I. 215; Filed 1/4/20].

- G. Order (I)(A) Approving Bidding Procedures and Bid Protections, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of the Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving the Sale of Substantially All Assets of Taylor Express, Inc. Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 218; Filed 1/6/20].
- H. Affidavit of Service: Notice of Filing of Asset Purchase Agreements as Exhibits to Debtors' Taylor Express Assets Bidding Procedures Motion [D.I. 234; Filed 1/7/20].
- I. Notice of Auction and Sale Hearing Regarding Taylor Express Business and Assets [D.I. 245; Filed 1/9/20].
- J. Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of The Business of Taylor Express, Inc. [D.I. 253; Filed 1/9/20].
- K. Affidavit of Service: Notice of Auction and Taylor Express Asset Sale Hearing [D.I. 283; Filed 1/14/20].
- L. Affidavit of Service: Notice of (i) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (ii) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Taylor Express Assets [D.I. 286; Filed 1/15/20].
- M. Supplemental Affidavit of Service: Notice of Auction and Taylor Express Asset Sale Hearing [D.I. 294; Filed 1/15/20].
- N. Asset Purchase Agreement between Celadon Group, Inc. and White Willow Holdings LLC [D.I. 305; Filed 1/16/20].
- O. Notice of Intent to Designate White Willow Holdings LLC as Designated Stalking Horse Bidder for the Taylor Express, Inc. Business and Assets [D.I. 306; Filed 1/16/20].
- P. Notice of Sales Going Forward at the Auction Assets [D.I. 317; Filed 1/20/20].
- Q. [Proposed] Order (A) Approving the Asset Purchase Agreement, (B) Authorizing and Approving the Sale to the Buyer of Substantially All Assets of Taylor Express, Inc. Pursuant to Section 363 of the Bankruptcy Code Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (C) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Pursuant to Section 365 of the Bankruptcy Code; (D) Authorizing the Debtors to Consummate

Transactions Related to the Above; and (E) Granting Related Relief [**Taylor**] [D.I. TBD; Filed TBD].

Responses Received:

- A. United States' Limited Objection to Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of Taylor Express, Inc. [D.I. 147; Filed 12/24/19].
- B. Informal comments from the Office of the United States Trustee.
- C. Limited Objection of Bridge Funding Group, Inc. to (I) Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of Taylor Express, Inc. and (II) Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of the Remaining Assets [D.I. 159; Filed 12/27/19].
- D. Limited Objection of the Official Committee of Unsecured Creditors to the (I) Debtors' Motion Approving Bidding Procedures for the Sale of Substantially All Assets of Taylor Express, Inc. and (II) Debtors Motion Approving Bidding Procedures for the Sale of All Remaining Assets [D.I. 162; Filed 12/27/19].
- E. Debtors' Response to the Limited Objections of The United States of America to the Motions for Entry of Orders (I) Approving Bidding Procedures, Bid Protections and Related Relief Relating to The Taylor Assets and (II) Approving Bidding Procedures, Bid Protections and Related Relief Relating to The Debtors' Remaining Assets [D.I. 189; Filed 1/2/20].
- F. Limited Objection and Reservation of Rights of Anthem Insurance Companies, Inc. Regarding Proposed Sale of Assets of Taylor Express, Inc. [D.I. 356; Filed 1/27/20].

Cure Responses Received:

- A. Objection and Reservation of Rights of Comdata Inc. to Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Business of Taylor Express, Inc. [D.I. 330; Filed 1/22/20].
- B. Objection and Reservation of Rights of Wells Fargo Equipment Finance, Inc. in Response to Debtors' Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Business of Taylor Express, Inc. [D.I. 334; Filed 1/22/20].
- C. Objection of Mercedes-Benz Financial Services USA LLC to Debtors Notice of Cure and Reservation of Rights [D.I. 335; Filed 1/22/20].

- D. Objection of the Chubb Companies to the Debtors Proposed Sale of Assets [D.I. 340; Filed 1/23/20].

Status: This matter will go forward.

8. **Remaining Assets** – Motion of the Debtors for the Entry of Orders: (I)(A) Approving Bidding Procedures for the Sale of the Remaining Assets and Setting Bid Protections Guidelines, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of the Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving the Sale of Substantially All Assets of Certain of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 79; Filed 12/14/19].

Response Deadline: January 23, 2020 at 4:00 p.m. (ET); extended upon agreement for certain parties in interest.

Related Documents:

- A. Omnibus Notice of Motions, Applications and Hearing [D.I. 105; Filed 12/17/19].
- B. Affidavit of Service: Remaining Assets Bidding Procedures Motion [D.I. 108; Filed 12/18/19].
- C. Notice Of Filing Of Exhibits To Debtors' Remaining Assets Bidding Procedures Motion [D.I. 179; Filed 12/30/19].
- D. Affidavit of Service: Notice of Filing of Exhibits to Debtors' Remaining Assets Bidding Procedures Motion [D.I. 185; Filed 12/31/19].
- E. Supplement to Motion of The Debtors for Entry of Orders (I)(A) Approving Bidding Procedures and Bid Protections, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of The Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving The Sale of Substantially All Assets of Certain of The Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [Remaining Assets] [D.I. 188; Filed 1/2/20].
- F. Notice of Filing of Asset Purchase Agreements as Exhibits to Debtors' Remaining Assets Bidding Procedures Motion [D.I. 198; Filed 1/3/20].
- G. Certification of Counsel in Connection with Order Approving Remaining Assets Bidding Procedures [D.I. 216; Filed 1/4/20].

- H. Order (I)(A) Approving Bidding Procedures and Bid Protections, (B) Permitting Debtors to Designate Stalking Horse Purchaser(s) and Grant Bid Protections, (C) Scheduling a Hearing to Consider Approval of the Sale of Assets, (D) Approving Form and Manner of Notice of Sale, and (E) Granting Related Relief; and (II)(A) Authorizing and Approving the Sale of Substantially All Assets of Certain of the Debtors Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Granting Related Relief [D.I. 219; Filed 1/6/20].
- I. Affidavit of Service: Supplement to the Remaining Assets Bidding Procedures Motion [D.I. 226; Filed 1/6/20].
- J. Affidavit of Service: Notice of Filing of Asset Purchase Agreements as Exhibits to Debtors' Remaining Assets Bidding Procedures Motion [D.I. 234; Filed 1/7/20].
- K. Notice of Auction and Remaining Asset Sale Hearing [D.I. 246; Filed 1/9/20].
- L. Asset Purchase Agreement With Transport Enterprise Leasing, LLC [D.I. 247; Filed 1/9/20].
- M. Notice of Intent To Designate Transport Enterprise Leasing, LLC As Designated Stalking Horse Bidder For The Real Property Located At 9503 East 33rd Street, Indianapolis, Indiana [D.I. 248; Filed 1/9/20].
- N. Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Remaining Assets [D.I. 254; Filed 1/9/20].
- O. Asset Purchase Agreement by and between Celadon Group, Inc. and Contract Leasing Corp. (Indianapolis, IN) [D.I. 267; Filed 1/13/20].
- P. Asset Purchase Agreement by and between Celadon Group, Inc. and Contract Leasing Corp. (Lima, OH) [D.I. 268; Filed 1/13/20].
- Q. Asset Purchase Agreement by and between Celadon Group, Inc. and Vorbas, LLC and Skippers Crew, LLC (Ottoville, OH) [D.I. 269; Filed 1/13/20].
- R. Notice of Intent to Designate Skippers Crew, LLC as Designated Stalking Horse Bidder for the Real Property Located at 101 Dollar Street, Ottoville, OH 45844 [D.I. 270; Filed 1/13/20].
- S. Notice of Intent to Designate Contract Leasing Corp. as Designated Stalking Horse Bidder for the Real Property Located at 9420 East 30th Street, Indianapolis, IN 46229 [D.I. 271; Filed 1/13/20].

- T. Notice of Intent to Designate Contract Leasing Corp. as Designated Stalking Horse Bidder for the Real Property Located at 112 Garford Avenue, Lima, OH 45804 [D.I. 272; Filed 1/13/20].
- U. Affidavit of Service: Asset Purchase Agreement with Transport Enterprise Leasing, LLC and Notice of Intent to Designate Transport Enterprise Leasing, LLC as Designated Stalking Horse Bidder for the Real Property Located at 9503 East 33rd Street, Indianapolis, Indiana [D.I. 282; Filed 1/14/20].
- V. Affidavit of Service: Notice of Auction and Remaining Asset Sale Hearing [D.I. 283; Filed 1/14/20].
- W. Affidavit of Service: Notice of (i) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (ii) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Remaining Assets [D.I. 286; Filed 1/15/20].
- X. Supplemental Affidavit of Service: Notice of Auction and Remaining Asset Sale Hearing [D.I. 294; Filed 1/15/20].
- Y. Affidavit of Service: Notice of Intent to Designate Skippers Crew, LLC as Designated Stalking Horse Bidder for the Real Property Located at 101 Dollar Street, Ottoville, OH 45844; Notice of Intent to Designate Contract Leasing Corp. as Designated Stalking Horse Bidder for the Real Property Located at 9420 East 30th Street, Indianapolis, IN 46229; Notice of Intent to Designate Contract Leasing Corp. as Designated Stalking Horse Bidder for the Real Property Located at 112 Garford Avenue, Lima, OH 45804 [D.I. 295; Filed 1/15/20].
- Z. Affidavit of Service: Motion of the Debtors for Entry of an Order (i) Authorizing the Private Sale of Certain Nonresidential Real Property Located in York, Pennsylvania Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (ii) Authorizing the Seller to Assume and Assign Certain Executory Contracts, and (iii) Granting Other Related Relief; Motion of the Debtors for Entry of an Order (i) Approving the Private Sale of Certain Nonresidential Real Property Located in Ayr, Ontario, Canada Free and Clear of All Liens, Claims, Encumbrances and Other Interests and (ii) Granting Other Related Relief; Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 296; Filed 1/15/20].
- AA. Asset Purchase Agreement between Celadon Group, Inc. (Seller) and Melissa Russell Rubel and Matthew Evan Rubel (Buyer) [D.I. 303; Filed 1/16/20].
- BB. Notice of Intent to Designate the Rubels as Designated Stalking Horse Bidder for Certain Andy Warhol Screen Prints [D.I. 304; Filed 1/16/20].
- CC. Asset Purchase Agreement with White Willow Holdings LLC [D.I. 305; Filed 1/16/20].

- DD. Omnibus Notice of Private Sale Motions and Sale Hearing [York, Cedar Creek, Winnipeg] [D.I. 309; Filed 1/17/20].
- EE. Certificate of No Objection Regarding Notice of Intent to Designate Transport Enterprise Leasing, LLC as Designated Stalking Horse Bidder for the Real Property Located at 9503 East 33rd Street, Indianapolis, Indiana [D.I. 310; Filed 1/17/20].
- FF. Notice of Sales Going Forward at the Auction Assets [D.I. 317; Filed 1/20/20].
- GG. Certificate of No Objection Regarding Notice Of Intent To Designate Skippers Crew, LLC As Designated Stalking Horse Bidder For The Real Property Located At 101 Dollar Street, Ottoville, OH 45844 [D.I. 327; Filed 1/22/20].
- HH. Certificate of No Objection Regarding Notice Of Intent To Designate Contract Leasing Corp. As Designated Stalking Horse Bidder For The Real Property Located At 9420 East 30th Street, Indianapolis, IN 46229 [D.I. 328; Filed 1/22/20].
- II. Certificate of No Objection Regarding Notice Of Intent To Designate Contract Leasing Corp. As Designated Stalking Horse Bidder For The Real Property Located At 112 Garford Avenue, Lima, Ohio 95804 [D.I. 329; Filed 1/22/20].
- JJ. Notice of Completion of Auction and Successful Bidders [D.I. 338; Filed 1/22/20].
- KK. Asset Purchase Agreement By and Between Celadon Group, Inc. and P.A.M. Transportation Services, Inc. [Laredo] [D.I. 352; Filed 1/24/20].

Responses Received:

- A. United States' Limited Objection to Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of the Remaining Assets [D.I. 146; Filed 12/24/19].
- B. Informal comments from the Office of the United States Trustee.
- C. Limited Objection of Bridge Funding Group, Inc. to (I) Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of Taylor Express, Inc. and (II) Motion of the Debtors for Entry of Orders Approving Bidding Procedures for the Sale of the Remaining Assets [D.I. 159; Filed 12/27/19].
- D. Limited Objection of the Official Committee of Unsecured Creditors to the (I) Debtors' Motion Approving Bidding Procedures for the Sale of Substantially All Assets of Taylor Express, Inc. and (II) Debtors Motion Approving Bidding Procedures for the Sale of All Remaining Assets [D.I. 162; Filed 12/27/19].
- E. Debtors' Response to the Limited Objections of The United States of America to the Motions for Entry of Orders (I) Approving Bidding Procedures, Bid Protections and Related Relief Relating to The Taylor Assets and (II) Approving Bidding

Procedures, Bid Protections and Related Relief Relating to The Debtors' Remaining Assets [D.I. 189; Filed 1/2/20].

- F. Objection to Sale of Certain Vehicles [D.I. 341; Filed 1/23/20].

Cure Responses Received:

- A. Objection of Haier US Appliance Solutions, Inc. d/b/a GE Appliances to Debtors' Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Remaining Assets [D.I. 318; Filed 1/21/20].
- B. Objection of the Chubb Companies to the Debtors Proposed Sale of Assets [D.I. 340; Filed 1/23/20].
- C. Objection of Sese Logistics US, LLC to Debtors' Notice of (I) Cure Amount with Respect to Executory Contracts and Unexpired Leases Potentially to be Assumed and Assigned and (II) Potential Assumption and Assignment of Executory Contracts and Unexpired Leases Regarding Sale of the Remaining Assets [D.I. 342; Filed 1/23/20].

Proposed Orders:

- A. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [**Laredo**] [D.I. TBD; Filed TBD].
- B. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [**Ottoville**] [D.I. TBD; Filed TBD].
- C. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [**9420 E. 30th**] [D.I. TBD; Filed TBD].

- D. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [**9503 E. 33rd**] [D.I. TBD; Filed TBD].
- E. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [**Lima**] [D.I. TBD; Filed TBD].
- F. [Proposed] Order (A) Authorizing and Approving the Sale of Certain of the Remaining Assets of the Debtors Free and Clear of All Liens, Claims, Encumbrances and Other Interests and (B) Granting Related Relief [**Warhol**] [D.I. TBD; Filed TBD].

Status: This matter will go forward.

- 9. Motion of the Debtors for Entry of an Order (I) Authorizing the Private Sale of Certain Nonresidential Real Property Located in York, Pennsylvania Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts, and (III) Granting Other Related Relief [D.I. 266; Filed 1/13/20].

Response Deadline: January 28, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 274; Filed 1/13/20].
- B. Supplement to the Omnibus Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 277; Filed 1/14/20].
- C. Order Shortening Notice and Objection Periods in Connection With the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 299; Filed 1/16/20].
- D. Omnibus Notice of Private Sale Motions and Sale Hearing [York, Cedar Creek, Winnipeg] [D.I. 309; Filed 1/17/20].
- E. Notice of Substitution of Exhibit with Respect to the York Property Purchase Agreement [D.I. 339; Filed 1/22/20].

- F. [Proposed] Order (I) Authorizing the Private Sale of Certain Nonresidential Real Property Located in York, Pennsylvania Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts, and (III) Granting Related Relief [**York**] [D.I. TBD; Filed TBD].

Responses Received:

- A. Reservation of Rights of the Official Committee of Unsecured Creditors Regarding the Debtors' Sale Motions [D.I. 344; Filed 1/23/20].

Status: This matter is going forward.

10. Motion of the Debtors for Entry of an Order (I) Approving the Private Sale of Certain Nonresidential Real Property Located in Ayr, Ontario, Canada Free and Clear of All Liens, Claims, Encumbrances and Other Interests and (II) Granting Other Related Relief [D.I. 273; Filed 1/13/20].

Response Deadline: January 28, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Omnibus Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 274; Filed 1/13/20].
- B. Supplement to the Omnibus Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection with the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 277; Filed 1/14/20].
- C. Order Shortening Notice and Objection Periods in Connection With the (A) York Private Sale Motion and (B) Cedar Creek Private Sale Motion [D.I. 299; Filed 1/16/20].
- D. Omnibus Notice of Private Sale Motions and Sale Hearing [York, Cedar Creek, Winnipeg] [D.I. 309; Filed 1/17/20].
- E. Notice of Substitution of Exhibit with Respect to the York Property Purchase Agreement [D.I. 339; Filed 1/22/20].
- F. [Proposed] Order (I) Approving the Private Sale of Certain Nonresidential Real Property Located in Ayr, Ontario, Canada Free and Clear of All Liens, Claims, Encumbrances and Other Interests and (II) Granting Other Related Relief [**Cedar Creek**] [D.I. TBD; Filed TBD].

Responses Received:

- A. Reservation of Rights of the Official Committee of Unsecured Creditors Regarding the Debtors' Sale Motions [D.I. 344; Filed 1/23/20].

Status: This matter is going forward.

- 11. Motion of the Debtors for Entry of an Order (I) Authorizing the Private Sale of Certain Non-Residential Real Property Located In Winnipeg, Manitoba, Canada Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts, and (III) Granting Other Related Relief [D.I. 301; Filed 1/16/20].

Response Deadline: January 28, 2020 at 4:00 p.m. (ET).

Related Documents:

- A. Motion of the Debtors for Entry of an Order Shortening Notice and Objection Periods in Connection With the Winnipeg Private Sale Motion [D.I. 302; Filed 1/16/20].
- B. Order Shortening Notice and Objection Periods in Connection With the Winnipeg Private Sale Motion [D.I. 308; Filed 1/17/20].
- C. Omnibus Notice of Private Sale Motions and Sale Hearing [York, Cedar Creek, Winnipeg] [D.I. 309; Filed 1/17/20].
- D. Notice of Substitution of Exhibit with Respect to the Winnipeg Property Purchase Agreement [D.I. 314; Filed 1/17/20].
- E. [Proposed] Order (I) Authorizing the Private Sale of Certain Nonresidential Real Property Located in Winnipeg, Manitoba, Canada Free and Clear of All Liens, Claims, Encumbrances and Other Interests, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts, and (III) Granting Related Relief [**Winnipeg**] [D.I. TBD; Filed TBD].

Responses Received:

- A. Reservation of Rights of the Official Committee of Unsecured Creditors Regarding the Debtors' Sale Motions [D.I. 344; Filed 1/23/20].

Status: This matter is going forward.

Dated: January 28, 2020
Wilmington, Delaware

Respectfully submitted,

DLA PIPER LLP (US)

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